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IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

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2020 DEC 29 PM 2:44

UNITED STATES OF AMERICA,
Plaintiff,
v.

[1] **Edgardo C. Sanchez-Sosa**,
(Counts 1 through 7, 10 through 13)
[2] **Guelvin Benítez-Carrasquillo**,
(Counts 1 through 3, 8, 10, 12, 13)
[3] **Gellitza Ortiz-Martínez**,
(Counts 1, 2, 9)

[REDACTED]
(Counts 1 through 3, 10 through 13)

[REDACTED]
(Counts 1 through 3, 10, 11, 14)

Defendants.

SUPERSEDING INDICTMENT

Criminal No. 19-647 (RAM)

Violation:

21 U.S.C. §§ 841(a)(1), 843, 846

18 U.S.C. § 1703(a)

18 U.S.C. § 1512(c)(1)

18 U.S.C. § 2

Forfeiture:

21 U.S.C. § 853(a)

THE GRAND JURY CHARGES

COUNT ONE

Conspiracy to Possess With Intent to Distribute Controlled Substances (Cocaine)

21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(ii), and 846

Beginning on a date unknown, but not later than August 2019, and continuing to on or about October 2, 2019, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] **Edgardo C. Sánchez-Sosa**,
[2] **Guelvin Benítez-Carrasquillo**,
[3] **Gellitza Ortiz-Martínez**,
[REDACTED]
[REDACTED]

the defendants herein, knowingly and intentionally combined, conspired, confederated and agreed with each other, and others known and unknown to the Grand Jury, to commit the following offense against the United States: to possess with intent to distribute 5 kilograms

or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(ii), and 846.

COUNT TWO

**Possession with Intent to Distribute Cocaine
21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(ii); and 18 U.S.C. § 2**

On or about October 2, 2019, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] Edgardo C. Sánchez-Sosa,

[2] Guelvin Benítez-Carrasquillo,

[3] Gellitza Ortiz-Martínez,

[REDACTED]
[REDACTED]

the defendants herein, aiding and abetting each other, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance. All in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(ii) and 18 U.S.C. § 2.

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COUNT THREE
Use of Communication Facility
21 U.S.C. §§ 843(b), and 846

Beginning on a date unknown, but not later than the year 2012, and continuing to on or about October 3, 2019, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] Edgardo C. Sánchez-Sosa,
[2] Guelvin Benítez-Carrasquillo,




the defendants herein, knowingly and intentionally combined, conspired, confederated and agreed with each other, and others known and unknown to the Grand Jury, to commit the following offense against the United States: use any communication facility, to wit, the United States Postal Service Facilities located in San Juan and Canóvanas, in facilitating the commission of acts constituting a felony under Title 21, United States Code, Section 841(a)(1) and 846, that is, the offenses set forth in Counts One, Two and Ten of this superseding indictment. All in violation of 21 U.S.C. §§ 843(b) & (d)(1) and 846.

(Intentionally Left Blank)

COUNTS FOUR TO EIGHT**Delay of Mail
18 U.S.C. § 1703(a)**

On or about each of the dates set forth below, in the District of Puerto Rico, and within the jurisdiction of this Court, the defendant mentioned below, being a United States Postal Service officer and employee, did unlawfully delay packages entrusted to him, and which came into his possession and were intended to be conveyed by mail and carried and delivered by any carrier or other employee of the United States Postal Service, and forwarded through and delivered from any post office or station thereof established by authority of the Postmaster General or the Postal Service, as describe below:

COUNT	DATE OF THE DELAY	DEFENDANT	TRACKING NUMBER
4	September 17, 2019	[1] Edgardo C. Sánchez-Sosa	9505516209519260022113
5	September 17, 2019	[1] Edgardo C. Sánchez-Sosa	9505516209489260419247
6	September 17, 2019	[1] Edgardo C. Sánchez-Sosa	9505516209419260392080
7	October 2, 2019	[1] Edgardo C. Sánchez-Sosa	9505516209419275398824
8	October 3, 2019	[2] Guelvin Benítez-Carrasquillo	9505812857339273512333

Each Count a separate and distinct violation of 18 U.S.C. § 1703(a).

COUNT NINE
Tampering with Documents or Proceedings
18 U.S.C. § 1512(c)(1)

On or about October 2, 2019, in the United States, in the District of Puerto Rico and within the jurisdiction of this Court,



[3] Gellitza Ortiz-Martínez,

the defendant herein, did corruptly alter, destroy, mutilate, and conceal packages containing a mixture or substance containing a detectable amount of cocaine, and attempt to do so, with the intent to impair its integrity and availability for use in an official proceeding: to wit: an investigation being conducted by the United States Postal Service-Office of Inspector General, in violation of 18 U.S.C. § 1512(c)(1).

COUNT TEN
Conspiracy to Possess With Intent to Distribute Controlled Substances (Marihuana)
21 U.S.C. §§ 841(a)(1) & (b)(1)(D), and 846

Beginning on a date unknown, but not later than the year 2012, and continuing to on or about October 3, 2019, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] Edgardo C. Sánchez-Sosa,
[2] Guelvin Benítez-Carrasquillo,

the defendants herein, knowingly and intentionally combined, conspired, confederated and agreed with each other, and others known and unknown to the Grand Jury, to commit the following offense against the United States: to possess with intent to distribute a mixture or substance containing a detectable amount of marihuana, a Schedule I Controlled Substance, in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(D), and 846.

COUNTS ELEVEN TO THIRTEEN**Delay of Mail
18 U.S.C. §§ 1703(a), and 2**

On or about each of the dates set forth below, in the District of Puerto Rico, and within the jurisdiction of this Court, the defendants mentioned below, being United States Postal Service officers and employees, aiding and abetting each other, did unlawfully delay packages entrusted to them, and which came into their possession and were intended to be conveyed by mail and carried and delivered by any carrier or other employee of the United States Postal Service, and forwarded through and delivered from any post office or station thereof established by authority of the Postmaster General or the Postal Service, as describe below:

COUNT	DATE OF THE DELAY	DEFENDANTS	TRACKING NUMBER
11	December 21, 2018	[1] Edgardo C. Sánchez-Sosa, [REDACTED]	9505815897018351172445
12	March 12, 2019	[1] Edgardo C. Sánchez-Sosa, [2] Guelvin Benítez-Carrasquillo, [REDACTED]	9481710200883049792743
13	September 23, 2019	[1] Edgardo C. Sánchez-Sosa, [2] Guelvin Benítez-Carrasquillo, [REDACTED]	9505516203439256449922

Each Count a separate and distinct violation of 18 U.S.C. §§ 1703(a) and 2.

COUNT FOURTEEN
Tampering with Documents or Proceedings
18 U.S.C. § 1512(c)(1)

On or about October 3, 2019, in the United States, in the District of Puerto Rico and within the jurisdiction of this Court,

[REDACTED]

the defendant herein, did corruptly alter, destroy, mutilate, and conceal data contained in his LG cellphone, and attempt to do so, with the intent to impair its integrity and availability for use in an official proceeding: to wit: an investigation being conducted by the United States Postal Service-Office of Inspector General, in violation of 18 U.S.C. § 1512(c)(1).

NARCOTICS FORFEITURE ALLEGATIONS
21 U.S.C. § 853(a)(1) and (2)

The allegations contained in Counts One, Two, Three and Ten of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

Pursuant to 21 U.S.C. § 853, upon conviction of any of the offenses in violation to 21 U.S.C. §§ 841, 846 or 843 the defendants, [1] Edgardo C. Sánchez-Sosa, [2] Guelvin Benítez-Carrasquillo, [3] Gellitza Ortiz-Martínez [REDACTED]

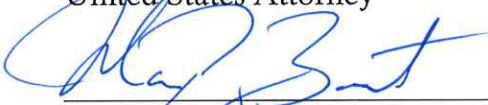
[REDACTED] shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

If any of the property described above, as a result of any act or omission from the defendants:

(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminish in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

TRUE BILL,

W. STEPHEN MULDROW
United States Attorney



Max Perez-Bouret
Assistant U.S. Attorney, Chief
Transnational Organized Crime Section



For: Vanessa E. Bonhomme
Assistant U.S. Attorney, Deputy Chief
Transnational Organized Crime Section

FOREPERSON

Date: December 29th 2020



Camille García Jiménez
Special Assistant U.S. Attorney